

EXHIBIT A



VIA ECF

The Honorable Judith E. Levy
U.S. District Court, Eastern District of Michigan
200 E. Liberty Street, Suite 300
Ann Arbor, MI 48104

February 20, 2024

Re: IN RE: FLINT WATER CASES –Veolia/Actum Outreach Issue
CASE NO. 16-CV-10444-JEL

Dear Judge Levy,

At the recently held hearing I advised the Court that we wanted to review the Veolia response to the Court's list of questions related to the Actum Flint Community outreach efforts on behalf of Veolia before we asked for relief. We have now had the opportunity to review Mr. Olson's response, Mr. Maimon's reply and now Veolia's 'Sur-Reply' and wish to ask for the following relief:

1. Leave to file a motion on an expedited basis seeking an order advancing the next Bellwether trial.
2. Leave to file a motion on an expedited basis seeking an order bifurcating liability from damages and setting the next Bellwether trial for a "liability only" trial; and
3. An Order directing Veolia and all its related entities to provide all information from any source within its control related to the Actum Flint Community outreach efforts including, but not limited to, any notes, emails, memorandum, summaries etc. related to contacts with any represented Flint resident or any Class member.

Respectfully submitted,

Hunter J. Shkolnik

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